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7 Jese David Carillo Casillas

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,) NO. 4:15-CR-6049-EFS
11)
12 Plaintiff,) DEFENDANT CARILLO CASILLAS'
13) NOTICE REGARDING
14 vs.) CHALLENGE TO
15) GOVERNMENT EXPERTS
16 JESE DAVID CARILLO CASILLAS)
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Comes now the defendant, Jese David Carillo Casillas, by and through counsel, Robin C. Emmans, and gives notice that, while he is not filing a Daubert challenge as of this deadline based upon disclosures to date, he does intend to raise a threshold admissibility challenge to the government's expert regarding drug modus operandi. He also anticipates the necessity of seeking pretrial rulings to delimit the scope of testimony of the government's various drug modus operandi experts.

In its disclosure dated July 14, 2017 (ECF 474), the government provides a list of three individuals to be called as experts regarding drug modus operandi. ECF 474 p. 5. Footnote three to that document also references a fact witness with related

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1 testimony. The disclosure goes on with a 7 page description of the anticipated
2 testimony from these experts as a group. The defense has communicated to the
3 government a request for more specific disclosures as to each, and the government
4 will review and be responding to that request. The defense therefore reserves the
5 right to respond to that additional information as it is provided.
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8 Counsel for Mr. Casillas has been able to reach counsel for some but not all
9 remaining defendants. As a result, Mr. Pechtel and Mr. Ryan join on behalf of Ms.
10 Granados (3), Mr. Hernandez joins on behalf of Ms. Mendoza Vasquez (7), Mr. Lara
11 joins on behalf of Ms. Zaragoza (10), Mr. Schweda joins on behalf of Mr. Farias (16),
12 and Mr. Smith joins on behalf of Mr. Zambrano (19). None have declined as of the
13 filing of this notice.
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17 Respectfully submitted this 28th day of November, 2017.
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20 s/Robin C. Emmans
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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notifications of such filing to AUSA Stephanie VanMarter and to attorneys for co-defendants.

s/ Robin C. Emmans

Robin C. Emmans, WSBA 37085
Attorney for Jese Carillo Casillas